

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>THERESA BUFFINGTON,</b>	)	<b>Civil Action No. 11-229 Erie</b>
	)	
<b>Plaintiff,</b>	)	
	)	<b>Judge Maurice B. Cohill</b>
<b>v.</b>	)	
	)	
<b>PEC MANAGEMENT II, LLP,</b>	)	
<b>d/b/a BURGER KING,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF'S UPDATED MOTION FOR ATTORNEYS' FEES AND COSTS**

In conjunction with the Court's Order and Opinion dated February 20, 2014, Plaintiff, through her undersigned counsel, submits the following Updated Motion for Attorneys' Fees and Costs, in which Plaintiff sets forth an accounting of fees and costs requested with adjustments from Plaintiff's original motion, as well as reasonable time billed on the attorneys' fees issue:

1. Plaintiff requests that Defendant pay Plaintiff's counsel (Goldman Schafer & Spear, P.C.) for the following fees and costs:

Attorney David Spear:	629 hours	x	\$300 per hour	=	<b>\$188,700</b>
Attorney Erin Friez:	379.73 hours	x	\$180 per hour	=	<b>\$68,351</b>
Attorney Jessica Michael:	99.2 hours	x	\$180 per hour	=	<b>\$17,856</b>
Attorney Elena Romer:	6.8 hours	x	\$180 per hour	=	<b>\$1,224</b>
Attorney Jennifer Mecs:	48.4 hours	x	\$180 per hour	=	<b><u>\$8,712</u></b>
Goldman Schafer & Spear, P.C. total Fees:					<b>\$284,843</b>
Goldman Schafer & Spear, P.C. total Costs:					<b><u>\$6,041.65</u></b>
Total Goldman Schafer & Spear, P.C. Fees and Costs:					<b>\$290,884.65</b>

2. In Plaintiff's original Motion for Fees and Expenses, Plaintiff included in her request fees for Goldman Schafer & Spear, P.C. for 25 hours of work on Plaintiff's Motion for Fees and Expenses and Brief in Support, from October 25, 2013 through November 16, 2013. Through the Court's Order, the Court already has reduced the fees on the hours Spear spent on this task during this time period from the \$400 to the \$300 rate. So Goldman Schafer Spear, P.C. is requesting no additional fees in this Amended Motion for Fees.

3. Attorneys Spear and Friez moved from Goldman Schafer & Spear, P.C. to the Minto Law Group, LLC on December 1, 2013.

4. Attached as Exhibit A are the bills for reasonable fees for hours expended by Attorneys Spear and Friez while at their new law firm, Minto Law Group, LLC on the issue of fees and expenses from December 1, 2013 through March 14, 2014. These fees were not included in Plaintiff's original motion for fees.

5. Plaintiff requests that Defendant be ordered to pay additional fees to Minto Law Group, LLC in the amount of \$20,226.

WHEREFORE, for all of the foregoing reasons, Plaintiff respectfully requests that the Court grant her Updated Motion for Attorneys' Fees and Costs.

Respectfully Submitted,

s/ David B. Spear  
David B. Spear  
PA Id. No. 62133

MINTO LAW GROUP, LLC  
Two Gateway Center  
603 Stanwix Street  
Suite 2025  
Pittsburgh, PA 15222  
(412) 201-5525

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Plaintiff's Updated Motion for Attorneys' Fees and Costs was electronically filed and sent to the following individual via the Court's ECF filing system, and is available for viewing and downloading therefrom:

Matthew W. McCullough, Esq.  
MacDonald, Illig, Jones & Britton LLP  
100 State Street, Suite 700  
Erie, PA 16507-1459  
(Counsel for Defendant)

s/ David B. Spear